

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,

*Plaintiff,*

Case No. 16-CR-21 (PP)

*vs.*

SAMY M. HAMZEH,

*Defendant.*

---

**UNOPPOSED MOTION TO EXTEND TIME FOR  
FILING SPOILIATION MOTIONS**

Samy Hamzeh, by counsel, moves this Court for an order extending by one week the schedule for filing any motions, responses, and replies relating to the spoliation hearing held December 12. The primary reason for the requested extension is that yesterday the government produced all of the texts from Special Agent Adkins that had been missing. The government also has produced a number of texts between agents and expects to produce more of those texts next week. The parties are working to resolve remaining issues to limit what needs to be decided by the Court, and the government has indicated it doesn't oppose an extension of time for filing motions.

Accordingly, Hamzeh requests a one-week extension of time for filing motions.

Dated at Milwaukee, Wisconsin this 18th day of January, 2019.

Respectfully submitted,

/s/ Craig W. Albee  
Craig W. Albee, WI Bar # 1015752  
Joseph A. Bugni, WI Bar #1062514  
FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.  
517 E. Wisconsin Ave - Rm 182  
Milwaukee, WI 53202  
Tel. (414) 221-9900  
E-mail: craig\_albee@fd.org

*Counsel for Defendant, Samy M. Hamzeh*